

1 Allen Sattler (Admitted *Pro Hac Vice*)  
2 Younjin (Jennifer) Lee (Admitted *Pro Hac Vice*)  
3 Brent Sedge (*Pro Hac Vice* Forthcoming)  
4 **CONSTANGY, BROOKS, SMITH & PROPHETE, LLP**  
5 3420 Bristol Street, 6th Floor  
6 Costa Mesa, California 92626  
7 Tel.: 949.743.3979  
8 Fax: 949.743.3934  
9 asattler@constangy.com  
10 jlee@constangy.com  
11 bsedge@constangy.com

12 *Counsel for Defendant Verge Agency, Inc.*

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 N.Z., R.M., B.L., S.M., and A.L.,  
16 individually and on behalf of  
17 themselves and all others similarly  
18 situated,

19 Plaintiffs,

20 vs.

21 FENIX INTERNATIONAL LIMITED,  
22 FENIX INTERNET LLC, BOSS  
BADDIES LLC, MOXY  
MANAGEMENT, UNRULY  
AGENCY LLC (also d/b/a DYSRPT  
AGENCY), BEHAVE AGENCY LLC,  
A.S.H. AGENCY, CONTENT X, INC.,  
VERGE AGENCY, INC., AND ELITE  
CREATORS LLC,

23 Defendants.

24 CASE NO. 8:24-cv-01655-FWS-SSC

25 **DEFENDANT VERGE AGENCY,  
INC.’S NOTICE OF NON-  
OPPOSITION TO THE FENIX  
DEFENDANTS’ (1) MOTION TO  
DISMISS FOR FORUM NON  
CONVENIENS; AND (2) MOTION  
TO COMPEL PLAINTIFFS TO  
PROCEED IN THEIR REAL  
NAMES**

26 Date: January 30, 2025

27 Time: 10:00 a.m.

28 Crtrm.: 10D

29 Assigned to Hon. Fred W. Slaughter

30 **TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**  
31 **PLEASE TAKE NOTICE** that Defendant Verge Agency, Inc. does not oppose the  
32 Motion to Dismiss for Forum Non Conveniens (Dkt. 60) or the Motion to Compel  
33

1 Plaintiffs to Proceed in Their Real Names (Dkt. 61) filed by Defendants Fenix  
2 International Limited and Fenix Internet LLC.

3 Respectfully submitted,

4 DATED: December 2, 2024 **CONSTANGY, BROOKS, SMITH & PROPHETE, LLP**

5  
6 By: /s/ Younjin Lee  
7 Allen Sattler (Admitted *Pro Hac Vice*)  
8 Younjin (Jennifer) Lee (Admitted *Pro Hac Vice*)  
9 Brent Sedge (*Pro Hac Vice* Forthcoming)  
10 **CONSTANGY, BROOKS, SMITH & PROPHETE, LLP**  
11 3420 Bristol Street, 6th Floor  
12 Costa Mesa, California 92626  
13 Tel.: 949.743.3979  
14 Fax: 949.743.3934  
15 asattler@constangy.com  
16 jlee@constangy.com  
17 bsedge@constangy.com

18 *Counsel for Defendant Verge Agency, Inc.*

## CERTIFICATE OF SERVICE

I am over 18 years of age and not a party to this action. I am employed in the County of Orange County, State of California. My business address is 3420 Bristol Street, 6th Floor, Costa Mesa, CA 92626.

**On December 2, 2024, I caused to be served a true copy of the document(s) entitled:**

**DEFENDANT VERGE AGENCY, INC.'S NOTICE OF NON-OPPOSITION  
TO THE FENIX DEFENDANTS' (1) MOTION TO DISMISS FOR FORUM  
NON CONVENIENS; AND (2) MOTION TO COMPEL PLAINTIFFS TO  
PROCEED IN THEIR REAL NAMES**

on the following individuals by the method(s) indicated below:

Michael C. McKay  
**MCKAY LAW, LLC**  
5635 N. Scottsdale Road, Suite 117  
Scottsdale, Arizona 85250  
Email: [mmckay@mckaylaw.us](mailto:mmckay@mckaylaw.us)

John Nelson (*pro hac vice*)  
**MILBERG COLEMAN BRYSON**  
**PHILIPS GROSSMAN, PLLC**  
280 S. Beverly Drive  
Beverly Hills, California 90212  
Email: [jnelson@milberg.com](mailto:jnelson@milberg.com)

Marc H. Edelson (*pro hac vice*)  
**EDELSON LECHTZIN LLP**  
411 S. State Street, Suite N300  
Newtown, Pennsylvania 18940  
Email: [medelson@edelson-law.com](mailto:medelson@edelson-law.com)

Ronald Podolny (*pro hac vice*)  
**MORGAN & MORGAN**  
201 N. Franklin Street, 7th Fl  
Tampa, Florida 33602  
ronald.podolny@forthepeople.com

Daniel Srourian (*pro hac vice*)  
**SROURIAN LAW FIRM, P.C.**  
468 N. Camden Drive, Suite 200  
Beverly Hills, California 90210  
Email: [daniel@slfla.com](mailto:daniel@slfla.com)

Carl V. Malmstrom (*pro hac vice*)  
**WOLF HALDENSTEIN ADLER**  
**FREEMAN & HERZ, LLC**  
111 W. Jackson Street, Suite 1700  
Chicago, Illinois 60604  
Email: [malmstrom@whafh.com](mailto:malmstrom@whafh.com)

*Counsel for Plaintiffs*

**BY ELECTRONIC TRANSMISSION:** By causing the document(s) to be transmitted by the Court's PACER filing system to the e-mail addresses of the individuals as indicated above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **December 2, 2024**, in Costa Mesa, California.

/s/ Younjin Lee  
Younjin (Jennifer) Lee